

Exhibit B

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

HOBART CORPORATION, et al.,	:	
Plaintiffs,	:	CASE NO. 3:10cv195
vs.	:	JUDGE WALTER H. RICE
WASTE MANAGEMENT OF OHIO, INC.,	:	
et al.,	:	
Defendants.	:	

**CARGILL, INCORPORATED'S PARTIAL RESPONSE TO PLAINTIFFS' FIRST SET
OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
PROPOUNDED UPON DEFENDANT CARGILL, INCORPORATED**

Defendant Cargill, Incorporated ("Cargill"), pursuant to the Federal Rules of Civil Procedure and agreement of counsel, hereby partially responds to Plaintiffs' First Set Of Interrogatories And Requests For Production Of Documents Propounded Upon Defendant Cargill, Incorporated.

PRELIMINARY STATEMENT AND RESERVATION

Pursuant to discussion and agreement among counsel for the parties, only Interrogatory 1 is being answered at this time. Cargill reserves all rights, including the right to object to and/or to ask for judicial relief with respect to, the other interrogatories and/or requests for the production of documents included within Plaintiffs' First Set Of Interrogatories And Requests For Production Of Documents Propounded Upon Defendant Cargill, Incorporated.

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INTERROGATORY NO. 1 RESPONSE

INTERROGATORY NO. 1: Identify each of Your Dayton Area Facilities, including for each facility (a) the name and address, (b) the time period(s) of Your ownership, leasing or operation of the facility, and (c) the business operation(s) conducted there.

ANSWER:

- (a) Cargill's sole "Dayton Area Facility," as defined, is a corn processing facility (the "Corn Mill") located at 3201 Needmore Road, Dayton, Ohio.
- (b) Cargill's ownership of the Corn Mill property began prior to April 24, 1973, and continues to the present. The Corn Mill was constructed on former farm land and began initial operation on April 24, 1973. The high fructose corn syrup portion of the Corn Mill was operated by Cargill under a joint venture arrangement from some time after the opening of the Corn Mill until approximately 1980, when Cargill became the sole operator. Production continues through this time.
- (c) The Corn Mill accepts #2 yellow corn, and through a series of milling, separation and treatment operations produces feed, corn syrup, high fructose corn syrup and other corn products.

/s/ Jack A. Van Kley
 Jack A. Van Kley, Trial Attorney
 Van Kley & Walker, LLC
 132 Northwoods Blvd., Suite C-1
 Columbus, Ohio 43235

and

Mark Erzen
 Mark D. Erzen, P.C.
 321 North Clark Street, Fifth Floor
 Chicago, Illinois 60654
 COUNSEL FOR DEFENDANT CARGILL, INCORPORATED

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VERIFICATION

STATE OF MINNESOTA)
COUNTY OF HENNEPIN)

Bart Eddy, being first duly sworn, states that I have read the foregoing "CARGILL, INCORPORATED'S PARTIAL RESPONSE TO PLAINTIFFS' FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED UPON DEFENDANT CARGILL, INCORPORATED." This response is based upon information that has been compiled by employees and others affiliated with Cargill, Incorporated, and from a review of files and records. Subject to the limitations set forth above, I am informed and believe that the information contained in the foregoing Response is true and correct, and on that ground state that the information contained herein is true and correct to the best of my knowledge, information, and belief.

Cargill, Incorporated

By: Bart Eddy

Printed Name: Bart Eddy

Title: AVP – Engineering, Cargill Corn Milling North America

SWORN TO BEFORE ME and subscribed in my presence this 9th day of September, 2011.

[Signature]
Notary Public

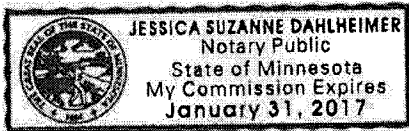


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CERTIFICATE OF SERVICE

On this 9th day of September, 2011, a copy of **CARGILL, INCORPORATED'S PARTIAL RESPONSE TO PLAINTIFFS' FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED UPON DEFENDANT CARGILL, INCORPORATED** was sent by electronic mail to:

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/s/ Mark Erzen